Subject: ACMP regulation comments

Date: Thu, 13 Dec 2001 15:19:03 -0900 From: "Joe LeBeau" <joe@akcenter.org>

To: "Randy Bates" < Randy_Bates@gov.state.ak.us>

Dear Mr. Bates:

ACMP comments from the Valley Office of Alaska Center for the Environment:

- 1. I fully support Mr. Shavelson's comments as submitted previously.
- 2. I think it is imperative for the state to require that all permit actions in the coast zone go through the ACMP process. I have seen coal mining leases run as single agency permits when in reality the coal mine will require many multiple agency permits in order to move from dream to operating status.
- 3. I think the state should look at not only the construction permits needed to make a facility a reality but the long range operational monitoring costs to make certain the facility is not degrading the coastal zone.
- 4. Permits to construct often do not take into account the permits necessary to operate a facility and while some of these can be single agency permits, public input into the permitting process is limited due to the single agency plan approval.
- 5. When wetlands are filled due to necessary construction activities, the state needs to be compensated for the full value of the habitat lost. An economic impact analysis should be completed to show the impacts of the wetlands loss, to future fish and water fowl production for the wetlands as well as the loss of view shed value to tourism industries due to the wetland fills.

Sincerely,

Joe LeBeau
Alaska Center for the Environment Valley Office.

Please note I have a new email address: joe@akcenter.org

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